

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2014-89-E

In the Matter of:)	
)	
)	
Application of Duke Energy)	PETITION TO INTERVENE
Progress, Incorporated for Approval)	
of Rider DSM/EE-6)	
)	
)	

Southern Alliance for Clean Energy (“SACE”) and the South Carolina Coastal Conservation League (“CCL”) (collectively, “Petitioners”), through counsel, hereby petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. On March 3, 2014, Duke Energy Progress, Incorporated (“DEP”) filed part of its application for approval of its Rider DSM/EE-6 to recover certain costs and revenue associated with its demand-side management and energy efficiency programs, pursuant to the Stipulation and Procedure and Mechanism for Recovery of Costs and Incentives for Demand-Side Management and Energy Efficiency Programs approved in Docket No. 2008-251-E. On March 7, 2014, DEP filed the remainder of its Application with the Commission, including Exhibit 1 and workpapers for the application.

2. DEP seeks to recover, through its proposed Rider DSM/EE-6, actual and estimated DSM/EE costs incurred from April 1, 2013 through March 31, 2014, and

forecasted costs covering July 1, 2014 through June 30, 2015. DEP requests that the proposed Rider DSM/EE-6 become effective on July 1, 2014.

3. SACE is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina and South Carolina. SACE has members in South Carolina who receive electricity service from DEP and who are subject to the direct impacts of DEP's DSM/EE rider. SACE and its members are interested in promoting greater reliance on energy conservation and efficiency to meet South Carolina's energy needs.

4. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, SC 29402. As an advocate for conservation and energy efficiency, CCL supports the development of energy policy that is in the public interest of South Carolinians and promotes energy savings. CCL has members in South Carolina who receive electricity service from DEP and who are subject to the direct impacts of DEP's DSM/EE rider. CCL and its members are interested in promoting greater reliance on energy efficiency as an energy resource in South Carolina.

5. Petitioners participated actively as parties in Docket No. 2008-251-E, in which the Commission approved the Stipulation pursuant to which DEP has filed its application in this docket, and in the past three annual DSM/EE cost recovery dockets, Docket Nos. 2011-181-E, 2012-93-E, and 2013-76-E.

6. Petitioners seek to intervene in this proceeding to ensure that their interests and their members' interests in promoting energy savings through energy efficiency are represented.

7. Petitioners do not seek a hearing in this proceeding. Petitioners have not yet fully developed their position but plan to present it in written comments to be filed with the Commission by May 15, 2014, pursuant to Order No. 2013-147. Should a public hearing be scheduled in this docket, Petitioners seek to reserve the right to participate in the hearing as a party of record.

8. Petitioners are represented by the following counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene in this matter.

Respectfully submitted this 28th day of March, 2014.

s/ J. Blanding Holman IV
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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail and electronic mail with a copy of the Petition to Intervene of Southern Alliance for Clean Energy and the South Carolina Coastal Conservation League.

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This 28th day of March, 2014.

s/ Robin G. Dunn